

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:20-CV-00504-FDW-DSC

CPI SECURITY SYSTEMS, INC.

Plaintiff,

v.

VIVINT SMART HOME, INC.
f/k/a MOSAIC ACQUISITION CORP.;
LEGACY VIVINT SMART HOME, INC.
f/k/a VIVINT SMART HOME, INC.

Defendants.

**PLAINTIFF’S RESPONSE TO
PRO SE MOTION FOR
TRANSCRIPTS**

In response to the motion filed by Ms. Christie Smythe, Plaintiff CPI Security Systems (“CPI”), Inc. states the following:

CPI does not oppose the motion. It is CPI’s view that the testimony and exhibits admitted in open court are open to the public pursuant to the broad right of access recognized by the Fourth Circuit and the Western District of North Carolina for court records. *See, e.g., Doe v. Pub. Citizen*, 749 F.3d 246, 266 (4th Cir. 2014) (“We have cautioned district courts that the right of public access, whether arising under the First Amendment or the common law, “may be abrogated only in unusual circumstances.”); *Legal Newsline v. Garlock Sealing Techs. LLC*, 518 B.R. 358, 364 (W.D.N.C. 2014) (“[T]he public and the press have a co-extensive right to view and consider documents tendered a judge and/or jury when a dispute is brought in the ultimate public forum, a courtroom.”). Furthermore, CPI does not intend to redact anything made part of the public record in open court.

Dated: March 7, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on the 7th day of March, 2023, I served the foregoing document by

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